

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

A.J. & Q.C.,

Plaintiffs,

v.

MASP, LLC,

Defendant.

CIVIL ACTION FILE

NO. 1:23-cv-4247-JPB

PLAINTIFFS' MOTION TO FILE UNDER SEAL

Pursuant to Federal Rules of Civil Procedure 26(c)(1) and 5.2(d), Local Rule 79.1(B), and the protective order in this case (Doc. No. 7), Plaintiffs file this Motion for Leave to file the following exhibits under seal:

Ex. No.	Description	Redacted or Requested to be Sealed
1	May 22, 2013 Incident Report	Redacted; Under Seal
2	A.J. Deposition	Redacted excerpts; Under seal
3	Q.C. Deposition	Redacted excerpts; Under seal
4	Indictment of Craig Hill and Tkeyah Adams	Redacted; Under seal
5	Warrant Application Affidavit	Redacted; Under seal
6	Case Disposition Summary	Redacted; Under seal
7	Plea Hearing Transcript	Redacted excerpts; Under seal

8	Det. Lewis Investigative Summary	Redacted; Under seal
9	Application for Criminal Arrest Warrant	Redacted; Under seal
10	Det. Simonds Investigative Summary	Redacted; Under seal
11	A.J. Written Statement	Redacted; Under seal
12	Q.C. Written Statement	Redacted; Under seal
13	Tkeyah Adams Suspect Interview Summary	Redacted; Under seal
14	Affidavit and Application for a Search Warrant	Redacted; Under seal
15	State v. Hill, No. 2013CR02540-06, Final Disposition	Redacted; Under seal
17	Def. MASP, LLC's Resps. to Pls' First Cont'g Reqs for Prod. of Docs	Redacted; Under seal

Thus, Plaintiffs request leave to file under seal these exhibits as it includes sensitive, protected, and/or identifying information in reference to Plaintiffs, documents, or persons as identified in the protective order.

Respectfully submitted this 11th day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

PATRICK J. MCDONOUGH

Georgia Bar No. 489855

pmcdonough@atclawfirm.com

JONATHAN S. TONGE

Georgia Bar No. 303999

jtonge@atclawfirm.com

JENNIFER M. WEBSTER

Georgia Bar No. 760381

jwebster@atclawfirm.com
Attorneys for Plaintiffs

One Sugarloaf Centre
1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
(770) 822-0900 | Telephone
(770) 236-9784 | Facsimile

CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

PATRICK J. MCDONOUGH

Georgia Bar No. 489855

pmcdonough@atclawfirm.com

JONATHAN S. TONGE

Georgia Bar No. 303999

jtonge@atclawfirm.com

JENNIFER M. WEBSTER

Georgia Bar No. 760381

jwebster@atclawfirm.com

Attorneys for Plaintiffs

One Sugarloaf Centre
1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
(770) 822-0900 | Telephone
(770) 822-9680 | Facsimile

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

Respectfully submitted this 11th day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

PATRICK J. MCDONOUGH

Georgia Bar No. 489855

pmcdonough@atclawfirm.com

JONATHAN S. TONGE

Georgia Bar No. 303999

jtonge@atclawfirm.com

JENNIFER M. WEBSTER

Georgia Bar No. 760381

jwebster@atclawfirm.com

Attorneys for Plaintiffs

One Sugarloaf Centre
1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
(770) 822-0900 | Telephone
(770) 236-9784 | Facsimile